



**INITIAL POLLUTION REPORT
LIBBY ASBESTOS
Libby, Lincoln County, Montana**

**ADMINISTRATIVE
RECORD**

I. HEADING

Date: September 29, 2003
Site Name: Libby Asbestos Site (BNSF Cleanup OU6)
From: James Christiansen, RPM
To: Kevin Mould, EPA Headquarters
POLREP No.: #7 for Libby Asbestos, initial POLREP for OU6, BNSF railyard

II. BACKGROUND

Site No.:	BC
Response Authority:	CERCLA
CERCLIS No:	MT0009083840
NPL Status:	Added to NPL: 10/23/02
Action Memorandum Status:	Approved 5/23/00
Action Memorandum Amendment:	08/13/01
Action Memorandum Amendment:	05/09/02

Start Date (OU 06 - BNSF) PRP - Lead:	08/13/03
Completion Date*:(OU 06 - BNSF) PRP - Lead:	TBD

III. SITE INFORMATION

A. Incident Category

PRP-Lead

B. Site Description

The Libby Asbestos Site includes an inactive vermiculite mine located in northwestern Montana. Vermiculite mining at Zonolite Mountain (the "mine") was commenced by the Universal Zonolite Company in the 1920s. In 1963, W.R. Grace acquired the property and continued operations until September, 1990.

The processed ore was trucked down the Rainy Creek Road to a Screening Plant, which separated the milled ore into several sizes. Subsequently, the screened ore was moved by conveyor belt across the Kootenai River and shipped either to the Export/Expansion Plant (Libby) or across the country by rail.

This initial POLREP concerns the Burlington Northern Santa Fe (BNSF) Rail

Yard in Libby. Sampling shows that asbestos, a hazardous substance, is present in soil, raw ore, ore-concentrate and other soil-like materials at various locations in and around the community of Libby including the BNSF railyard. Visible vermiculite has been found along the tracks and within the railyard and analytical results have shown asbestos levels in soil from 2-5%.

1. Site Location

The BNSF Railyard encompasses about 20 acres and is located in Section 7, Township 30 N, Range 31 W of Lincoln County, Montana. A total of six railroad tracks trending east-west are present along with associated buildings and siding platforms. The BNSF railyard is immediately adjacent to the former W.R. Grace Export Plant in downtown Libby.

2. Description of Threat

The ore body from which the vermiculite ore was mined contains significant occurrences of amphibole asbestos. Processing of the vermiculite ore, with amphibole asbestos intermixed, caused high dust and airborne releases of fine asbestos fibers. These fine asbestiform fibers have been linked to certain kinds of lung disease and abnormalities.

The Acting Assistant Administrator, Office of Solid Waste and Emergency Response has determined that the presence of the asbestos at the Site may present an imminent and substantial endangerment in the Action Memorandum.

C. Preliminary Assessment/Site Inspection Results

BNSF implemented its own investigations to determine if yard activities would entrain asbestos fibers into the air. Baseline monitoring along the track conducted by BNSF has found the highest concentrations measured during the sweeping ranges from 7 to 14 f/cc in air. A total of 22 surface soil samples collected along the railroad tracks and its railyard ranged from a trace to less than 1% fibrous amphibole asbestos by weight. In addition, visible unexpanded vermiculite remained at Tracks #1, #2 and #3.

IV. RESPONSE INFORMATION

A. Situation

Asbestos contaminated materials were hauled and shipped through the railyard, and spilled into the soil for decades. The soil around the tracks and under the ballast is contaminated and needs to be removed.

BNSF has agreed to perform the cleanup at the Libby railyards and its tracks

under an Administrative Order on Consent (AOC) to address the high levels of asbestos. The BNSF's work plan and sampling plan were approved on October 25, 2002. Cleanup began on August 13, 2003. Unfortunately, cleanup was not achieving satisfactory results, so work was stopped on August 21, 2003 and BNSF is reevaluating cleanup options. Work is expected to begin again in spring 2004. EPR-SR is overseeing the cleanup.

B. Enforcement

An Administrative Order on Consent (AOC) was entered into between the U.S. EPA and the Burlington Northern and Santa Fe Railway Company (BNSF) effective August 19, 2002. This AOC provides for the performance of a removal action by BNSF and the reimbursement of certain response costs incurred by the United States at or in connection with the BNSF property comprising the Libby railyard in Libby, Montana.

V. COST INFORMATION

The estimated cost of the cleanup is expected to be approximately \$1,500,000.

VI. DISPOSITION OF WASTES

The materials, contaminated with asbestos, will be disposed at the Lincoln County Landfill Cell.